

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

LEYLA NOURIAN (05)

CRIMINAL NO. 3:17-cr-155-L

**THE UNITED STATES OF AMERICA'S UNOPPOSED MOTION TO DISMISS
THE INDICTMENTS AGAINST DEFENDANT LEYLA NOURIAN**

The United States of America respectfully requests that this Court dismiss with prejudice Counts One and Two as charged and returned by the grand jury via Indictment on March 22, 2017 and Counts One, Ten, Twelve, Thirteen, Fifteen, and Sixteen as charged and returned by the grand jury via Superseding Indictment on September 11, 2019 in the above-styled case as to defendant Leyla Nourian, pursuant to Federal Rule of Criminal Procedure 48(a). (*See* Dkts. 3, 162.) The case remains pending against Leyla Nourian's co-defendants, Jamshid Noryian, Dehshid Nourian, Christopher Rydberg, Michael Taba, and Ali Khavarmanesh (who is a fugitive).

(continued on the next page)

Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

GLENN S. LEON
CHIEF, FRAUD SECTION

/s/ Carlos A. López

CARLOS A. LÓPEZ
Trial Attorney
Fraud Section, Criminal Division
U.S. Department of Justice
New York Bar No. 4256244
(202) 875-9038
carlos.lopez@usdoj.gov

ETHAN WOMBLE
Trial Attorney
Fraud Section, Criminal Division
U.S. Department of Justice
Texas Bar No. 24102757
(202) 674-5653
ethan.womble@usdoj.gov

KELLY M. LYONS
Fraud Section, Criminal Division
U.S. Department of Justice
New York Bar No. 5429113
(202) 923-6451
kelly.m.lyons@usdoj.gov

CERTIFICATE OF CONFERENCE

On October 11, 2022, I conferred with counsel for Defendant Leyla Nourian who indicated they were unopposed to the present motion.

/s/ Carlos A. López _____

CARLOS A. LOPEZ
Trial Attorney